

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Frederick W. Claybrook, Jr., supporting granting the Petition in 20-1057, *Oracle of America, Inc. v. United States, et al.*, contains 2,984 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

February 22, 2020

/s/ Frederick W. Claybrook, Jr.

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